

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW MEXICO**

JOHN EASTMAN

v.

UNITED STATES OF AMERICA

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Case No. 1:22-mc-00023

Declaration of Charles Burnham

DECLARATION

I, Charles Burnham, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel for movant in the above case.
2. I advised the Assistant United States Attorney supervising this investigation that the seized phone contains privileged information.
3. I requested in writing that the Assistant United States Attorney advise us of the procedures the government planned to follow for protection of privileged materials. I received no response to this request.

Executed on July 7, 2022.

/s/ Charles Burnham
Charles Burnham